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March 11, 2005

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Via Hand Delivery and Facsimile

Honorable Richard C. Casey
United States District Court
Southern District of New York
500 Pearl Street - Room 1950
New York, New York 10007

**Re: MDL 1570
Ashton, et al v. Al Qaeda, et al.
02 CV 6977 (RCC)**

Dear Judge Casey:

The Court has asked the Plaintiffs' Executive Committee to confer with the Plaintiffs' General Committee, and with representatives of the defense bar in this matter, and then report back to the Court regarding a procedure for addressing certain outstanding motions to dismiss. After appropriate discussion, I am reporting as follows:

Through its January 18, 2005 Opinion and Order, the Court dismissed the claims asserted against the Kingdom of Saudi Arabia, Prince Sultan bin Abdul Aziz al Saud, Prince Turki al Faisal al Saud, Prince Mohamed al Faisal al Saud and the al Rahji Banking & Investment Co., Inc. in some, but not all, of the consolidated actions. As to these five defendants, all plaintiffs are agreeable to relying upon their respective pleadings, as well as the briefs, exhibits, evidence and arguments previously presented or submitted to the Court in any of the consolidated actions, and further agree that any additional briefing or oral argument may be waived, unless the Court believes that

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additional briefing and argument would be beneficial. If the Court requires this position to be set forth in a formal stipulation, I would appreciate a member of Your Honor's staff so advising me so that one may be prepared.

As to these five defendants, absent a request by the Court for additional briefing or oral argument, a ruling on the outstanding motions to dismiss in actions not encompassed by the Court's January 18 Order and Opinion then would be in order. If, following review of the pleadings for the actions not encompassed within the scope of the Court's January 18 Order and Opinion, the Court were to extend its Order and Opinion to these five defendants in the remaining consolidated actions, I further am authorized to represent that all plaintiffs' counsel, as well as counsel for four of the five above-named defendants (all but al Rahji Bank) then would consent to the Court's entry of partial, final judgment in favor of these defendants and against all plaintiffs under Rule 54(b), so that, subject to approval by Your Honor, an immediate appeal then could be pursued, ideally on an expedited basis. An accelerated appellate review would be beneficial to all parties, by enabling the Second Circuit to decide whether this Court's judgment will be affirmed or denied, in whole or in part.

In addition, counsel for the O'Neill plaintiffs has affirmed that the above agreement and any order that is entered by the Court with respect to the Kingdom of Saudi Arabia would be applicable to and binding upon the following entities which are named as agencies of the Kingdom of Saudi Arabia in the O'Neill Complaint filed against the Kingdom of Saudi Arabia, 04 CV 1922:

Directorate Of Intelligence

General Staff

Intelligence Section (G-2)

Ministry Of State For Internal Affairs

Ministry Of Interior

Saudi Committee For Support Of The Intifada

The Supreme Council Of Islamic Affairs

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The Council Of Ministers

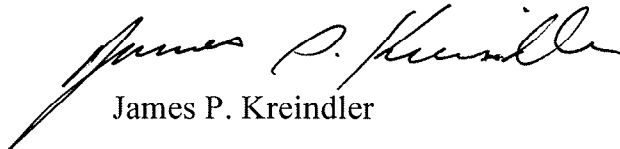
The Special Committee of the Council of Ministers

In the interim, of course, there are many defendants whose motions either are, or shortly will be, ripe for resolution. We are in the process of working with defense counsel to develop an appropriate list and proposed schedule for the Court's consideration. We expect to be in a position to report further to the Court within the next two weeks.

Thank you for your kind attention to this matter.

Very truly yours,

KREINDLER & KREINDLER LLP



James P. Kreindler

JPK:dmr

cc: MDL Plaintiffs and Defendants Counsel (via e-mail)